



COLUMBUS | CLEVELAND
CINCINNATI-DAYTON
MARIETTA

BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
MAIN: 614.227.2300
FAX: 614.227.2390

www.bricker.com
info@bricker.com

Frank L. Merrill
614.227.8871
fmerrill@bricker.com

US EPA RECORDS CENTER REGION 5



March 27, 2015

RECEIVED MAR 30 2015
SFD MH

VIA FEDERAL EXPRESS

Margaret Herring, Civil Investigator
U.S. Environmental Protection Agency, Region 5
Superfund Division
Enforcement and Compliance Assurance Branch (SE-5J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: The AES Corporation's Response to U.S. EPA's Request for
Information for The South Dayton Dump & Landfill Site in Moraine,
Ohio

Dear Ms. Herring:

On behalf of my client, The AES Corporation ("AES"), I hereby respond to the United States Environmental Protection Agency's ("U.S. EPA") January 16, 2015 Request for Information ("Information Request") for the South Dayton Dump & Landfill Site in Moraine, Ohio ("SDDL" or "Site"). On February 13, 2015 and March 19, 2015, AES requested and received an extension of time in which to respond to the Information Request.

AES is a holding company with no material assets other than the stock of its subsidiaries. As a result, AES does not operate any facilities or companies. In 2011, AES acquired DPL Inc., which owns 100% of the common stock of The Dayton Power and Light Company ("DP&L"). Therefore, the acquisition of DP&L came well after the closure of the Site and well after the agreed upon temporal limits of the Information Request (i.e., 1996). In light of the foregoing, it is apparent that AES has never used the Site because AES does not operate any facilities, and AES' acquisition of DP&L came well after the closure of the Site.

AES objects to the Information Request and its instructions and definitions as being overly broad, burdensome, vague, ambiguous, and beyond the scope of CERCLA § 104(e)(2)(A-C). AES also objects to the Information Request to the extent it seeks information that is protected by the attorney-client privilege or attorney work-product doctrine. AES specifically denies any liability and/or wrongdoing that may be alleged as a result of the Site investigation.

Subject to AES' objections, denial of liability and reservation of rights, AES provides the attached responses to the best of its ability and based on information that AES possesses at this time. AES reserves the right to

Margaret Herring, Civil Investigator
March 27, 2015
Page 2

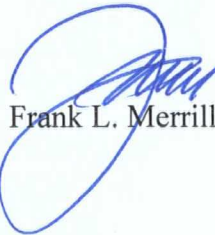
subsequently supplement this response as AES obtains or becomes aware of additional relevant information.

Finally, AES objects to U.S. EPA's Information Request to the extent it requires that the response be certified "by the individual who prepared the response or the responsible corporate official acting on behalf of the corporation". AES is unaware of any requirement under CERCLA or otherwise that imposes such a duty. The matters that are the subject of the Information Request, and AES' response, are not within the personal knowledge of the undersigned nor is there any official of AES or other individual who has personal knowledge of all such matters. This letter and attachment constitute the corporate response of AES to the Information Request and is based upon information obtained by and from employees and counsel for AES and its operating subsidiary DP&L. The undersigned is authorized to and has signed the response as counsel for AES.

AES' responses contained in Attachment A reflect U.S. EPA's agreement to limit the scope of the Information Request to the time period from 1941 to 1996 and the limit of the geographical scope to facilities within a fifty (50)-mile radius of the Site. Because the Information Request goes beyond U.S. EPA's authority under section 104(e) of CERCLA, AES' responses in Attachment A are limited to information that relates to the Site and/or has some nexus to the Site.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Frank L. Merrill

cc: Marc Michael (w/encl./via email)
Drew Campbell, Esq. (w/encl./via email)

ATTACHMENT A
The AES Corporation's
Response to U.S. EPA's Information Request for the South Dayton Dump Site

Question 1. Identify all persons consulted in the preparation of the answers to these questions.

Response:

This is a corporate response which is signed by counsel on behalf of The AES Corporation ("AES") and is based upon information provided or researched by the employees and counsel of AES and AES' operating subsidiary The Dayton Power and Light Company ("DP&L"). Notwithstanding the foregoing, the following individuals were consulted in the preparation of the answers to these questions:

JoAnne C. Rau
Director, Environment and Safety Management
The Dayton Power & Light Company
1065 Woodman Drive
Dayton, OH 45432
(937) 259-7376
joanne.rau@aes.com

Scott Arentsen
Environmental Specialist
The Dayton Power & Light Company
1065 Woodman Drive
Dayton, OH 45432
(937) 259-7375
scott.arentsen@aes.com

Question 2. Identify all documents consulted, examined or referred to in the preparation of the answers to these questions, and provide copies of all such documents.

Response:

AES, through counsel and employees of AES' operating subsidiary DP&L, consulted, examined and reviewed documents in the preparation of the responses to these questions. However, all of the material proved to be irrelevant and showed no connection between AES and the South Dayton Dump Site ("Site").

Question 3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons. Provide their current, or last known, address, telephone numbers, and e-mail address.

Response:

After reasonable due diligence and investigation, AES has no reason to believe that there may be persons, other than disclosed in Response to Question 1, able to provide a more detailed or complete response to any question in the Information Request.

Question 4. Provide names, addresses, telephone numbers, and e-mail addresses of any individuals, including former and current employees, who may be knowledgeable about Respondent's operations and hazardous substances handling, storage and disposal practices.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 5. State the date(s) on which the Respondent sent, brought or moved drums and/or hazardous substances to the South Dayton Dump and Landfill (SDDL) Site and the names, addresses, telephone numbers, and e-mail addresses of the person(s) making arrangements for the drums and/or hazardous substances to be sent, brought or moved to the SDDL Site.

Response:

None; AES has not discovered any evidence or indication of any hazardous substances generated by AES having been sent to the Site.

Question 6. Did Respondent haul or send materials to SDDL in vehicles it owned, leased or operated? If yes, during what time periods did this occur? If no, how did Respondent transport materials to SDDL? Identify the hauler(s) and provide the addresses, telephone numbers, and e-mail addresses of these entities.

Response:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

PERMITS/REGISTRATIONS

Question 7. List all federal, state and local permits and/or registrations and their respective permit numbers issued to Respondent for the transport and/or disposal of materials.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 8. Which shipments or arrangements were sent under each permit? If what happened to the hazardous substances differed from what was specified in the permit, please state, to the best of your knowledge, the basis or reasons for such difference.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 9: Were all hazardous substances transported by licensed carriers to hazardous waste Treatment Storage and Disposal Facilities permitted by the U.S. EPA?

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 10. List all federal, state and local permits and/or registrations and their respective permit numbers issued for the transport and/or disposal of wastes.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 11. Does your company or business have a permit or permits issued under Resource Conservation and Recovery Act? Does it have or has it ever had a permit or permits under the hazardous substance laws of the State of Ohio? Does your company or business have an EPA Identification Number, or an identification number supplied by the State Environmental Protection Agency? Supply any such identification number(s) your company or business has.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 12. Identify whether Respondent ever filed a Notification of Hazardous Waste Activity with the EPA or the corresponding agency or official of the State of Ohio, the date of such filing, the wastes described in such notice, the quantity thereof described in such notice, and the identification number assigned to such facility by EPA or the state agency or official.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

**RESPONDENT'S DISPOSAL/TREATMENT/STORAGE/RECYCLING/SALE
OF WASTE (INCLUDING BY-PRODUCTS)**

Question 13. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management. For each individual identified in response to this question provide the current or most recent known address, telephone number and email address.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 14. Describe the containers used to take any type of waste from Respondent's operation, including but not limited to:

- a. the type of container (e.g. 55 gal. drum, dumpster, etc.);

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- b. the colors of the containers;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- c. any distinctive stripes or other markings on those containers;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- d. any labels or writing on those containers (including the content of those labels);

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- e. whether those containers were new or used; and

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- f. if those containers were used, a description of the prior use of the containers.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

Question 15. For any type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling. Provide copies of all documents relating to the transportation or disposal of said waste, including correspondence and manifests. Include all correspondence and records of communication between Respondent and Cyril Grillot, Kenneth Grillot, Alcine Grillot, or Horace Boesch, Sr.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

Question 16. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- a. State where Respondent sent each type of its waste for disposal, treatment, or recycling.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- b. Identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- c. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- d. For each type of waste specify which Waste Carrier picked it up.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- e. For each type of waste, state how frequently each Waste Carrier picked up such waste.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- f. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- g. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- h. Provide copies of all documents containing information responsive to the previous seven questions.

Response:

After a diligent search for responsive documents, AES has not identified any documents responsive to this request, as it relates to the SDDL.

- i. Describe the vehicles used by each Waste Carrier to haul away each type of waste including but not limited to:
 - i. the type of vehicle (e.g., flatbed truck, tanker truck, containerized dumpster truck, etc.);

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- ii. names or markings on the vehicles; and

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- iii. the color of such vehicles.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- j. Identify all of each Waste Carrier's employees who collected Respondent's wastes.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- k. Indicate the ultimate disposal/recycling/treatment location for each type of waste.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- l. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- m. Describe how Respondent managed pickups of each waste, including but not limited to:
 - i. the method for inventorying each type of waste;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- ii. the method for requesting each type of waste to be picked up;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- iv. the amount paid or the rate paid for the pickup of each type of waste;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- v. the identity of (see Definitions) Respondent's employee who paid the bills; and

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- n. Identify the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- o. State the basis for and provide any documents supporting the answer to the previous question.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2). Subject to and without waving these objections, AES responds as follows:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

- p. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:
 - i. the nature and chemical composition of each type of waste;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2).

- ii. the dates on which those wastes were disposed;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2).

- iii. the approximate quantity of those wastes disposed by month and year;

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2).

- iv. the location to which these wastes drained (e.g. on-site septic system, on-site storage tank, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2).

- v. whether and what pretreatment was provided.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2).

- q. Identify any sewage authority or treatment works to which Respondent's waste was sent.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly broad, unduly burdensome, and is beyond the permissible scope of CERCLA § 104(e)(2).

- r. If not already provided, specify the dates and circumstances when Respondent's waste was taken to the SDDL Site, and identify the companies or individuals who brought Respondent's waste to the Site. Provide all documents which support or memorialize your response.

Response:

After reasonable due diligence and investigation, AES has not discovered any evidence or indication that it used or sent any material to the Site.

RESPONDENT'S ENVIRONMENTAL REPORTING:

Question 17. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome, and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 18. Identify (see Definitions) all federal offices to which Respondent has sent or filed information about hazardous substance or hazardous waste.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome, and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 19. State the years during which such information was sent/filed.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 20. Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome, and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 21. State the years during which such information was sent/filed.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 22. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq.; Solid Waste and Infectious Waste Regulations, OAC 3745-27 (former rule EP-20); Licenses for Solid Waste, Infectious Waste Treatment, or Construction and Demolition Debris Facilities, OAC 3745-37 (former rule EP-33); Solid and Hazardous Wastes, ORC 3734-01 through 3734-11; Open Burning Standards, OAC 3745-19-03.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).

Question 23. Identify the federal and state offices to which such information was sent.

Response:

AES objects to this request for information to the extent it requests information not related to the SDDL, on the bases that it is irrelevant, overly burdensome and broad and is beyond the permissible scope of CERCLA § 104(e)(2).